

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

TAYLA GREENE
as Administrator of the Estate of the
decedent RONALD GREENE

CIVIL ACTION NO: 20-cv-0578

JUDGE TERRY A. DOUGHTY

VERSUS

TROOPER DAKOTA DEMOSS, ET AL.

MAGISTRATE JUDGE KAYLA MCCLUSKY

**JOINT MOTION FOR ENTRY OF PROPOSED
CONSENT PROTECTIVE ORDER AND CONFIDENTIALITY AGREEMENT**

Plaintiff in the above-captioned action (“Plaintiff”) and the Louisiana Department of Public Safety & Corrections (Office of State Police) (“LSP”) (collectively, “the Parties”), by and through their undersigned counsel and pursuant to Federal Rule of Civil Procedure 26(c), jointly and respectfully move this Court to enter the proposed *Consent Protective Order and Confidentiality Agreement* (“*Order*”) (attached hereto as Exhibit 1) and its incorporated/referenced Exhibit A.

The Parties acknowledge and agree that discovery in the above-styled action will involve the production or disclosure of documents, materials, information, and/or testimony concerning and/or containing confidential, proprietary, personal health, and/ or personal information. Prior to filing this motion, the Parties stipulated and agreed to the form and substance of the *Order* regarding and governing such information. Accordingly, the Parties respectfully request that this Court enter the proposed *Order* (attached hereto as Exhibit 1).

[SIGNATURES MAY BE FOUND ON THE FOLLOWING PAGE]

Respectfully Submitted,

//s// John J. Coyle

John J. Coyle*

Mark V. Maguire*

McEldrew Purtell

123 South Broad Street, Ste. 2250

Philadelphia, PA 19109

TELEPHONE: (215) 545-8800

mmaguire@mceldrewpurtell.com

jcoyle@mceldrewpurtell.com

CHERDY SHERMAN ET AL

James M. Williams, Esq.

1 Galleria Blvd, Ste. 1100

Metairie, LA 70001

T: (504) 962-4292

F: (504) 833-8080

E: james@thetrialteam.com

Counsel for the Plaintiff

LIZ MURRILL

Attorney General

BY: /s/Jennie P. Pellegrin

JENNIE P. PELLEGRIN

La. Bar Roll No. 25207

jpellegrin@neunerpate.com

BEN L. MAYEAUX

La. Bar Roll No. 19042

bmayeaux@neunerpate.com

NEUNERPATE

One Petroleum Center, Suite 200

1001 West Pinhook Road (zip 70503)

Post Office Drawer 52828

Lafayette, LA 70505-2828

TELEPHONE: (337) 237-7000

FAX: (337) 233-9450

*Special Assistant Attorneys General and Counsel for
the Louisiana Department of Public Safety &
Corrections (Office of State Police)*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Joint Motion for Entry of Proposed Consent Protective Order and Confidentiality Agreement* was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel by operation of the court's electronic filing system.

/s/ John J. Coyle

John J. Coyle, Esq.